

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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**JOSEPH SIMMONS,**

**Plaintiffs,**

**v.**

**CITY OF PHILADELPHIA, et al.,**

**Defendants.**

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**Civil Action  
No. 22-1644**

**ORDER**

**AND NOW**, this \_\_\_\_\_ day of \_\_\_\_\_, 2024, it is hereby **ORDERED** and **DECREED** that Counsel for Defendant shall be permitted to depose Plaintiff Joseph Simmons, #QK6813, an incarcerated person, at a time, date and manner convenient to the parties and the administration at the Pennsylvania Department of Corrections.

BY THE COURT:

  

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**Civil Action  
No. 22-1644**

**DEFENDANTS' MOTION TO DEPOSE  
AN INCARCERATED INDIVIDUAL**

Defendant the City of Philadelphia, by and through it undersigned counsel, hereby files this Motion to Depose an Incarcerated Individual and states in support thereof:

1. Plaintiff Joseph Simmons has filed a civil action against the Defendant, alleging violations of his federal civil rights.
2. According to the docket, and confirmed by undersigned counsel utilizing the Pennsylvania Department of Correction's Inmate Locator function, Plaintiff is currently incarcerated at SCI Camp Hill under the Pennsylvania Department of Corrections with an inmate number of QK6813.
3. Federal Rule of Civil Procedure 30(a)(2)(B) requires an Order to depose an incarcerated individual.
4. Defendant respectfully requests that this Honorable Court issue the proposed order allowing the deposition of Plaintiff.

**WHEREFORE,** Defendant asks that the Court enter an Order in the form proposed.

Respectfully submitted,

Date: November 15, 2024

/s/ Kathryn Faris

Kathryn Faris, Esquire

Senior Attorney

Pa. Attorney ID No. 318580

City of Philadelphia Law Department

1515 Arch Street, 14<sup>th</sup> Floor

Philadelphia, PA 19102

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**Civil Action  
No. 22-1644**

**CERTIFICATE OF SERVICE**

I hereby certify that on the date below Defendant's Motion to Depose an Incarcerated Individual was filed via the Court's electronic filing system and is thus available for downloading by all parties.

Respectfully submitted,

Date: November 15, 2024

/s/ Kathryn Faris  
Kathryn Faris, Esquire  
Senior Attorney  
Pa. Attorney ID No. 318580  
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1515 Arch Street, 14<sup>th</sup> Floor  
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